## Yun, Joseph

From: Joyce Dillard [dillardjoyce@yahoo.com]
Sent: Friday, October 19, 2007 3:45 PM

To: Yun, Joseph

Cc: Guivetchi, Kamyar; Dabbs, Paul

**Subject:** Comments to IWRMP Grant Program Props 84 and 1E Due 10/19/2007

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Disadvantage Communities:

The non-profit corporation approach to Disadvantaged Community funding and planning is an erroneous one.

Environmental justice does not occur in private corporate groups, but social groups affiliating by commonality, like school, church, chambers of commerce, hobby or sport. There are key leaders in "Disadvantaged Communities," like the "elder woman" whose network of contacts exceed any outside group.

It is that vast network that keys in any change.

Even though "disadvantaged communities" appear low to moderate income, the government entitlements change the area to "emerging;" and therefore desirable to outside developers and investors. The more entitlements generated the more corruption.

FULL DISCLOSURE, OPEN MEETINGS, ACCESSABLE PUBLIC RECORDS are key to an effective change in a disadvantaged community. Non-profit corporations, defined as public benefit but never measured, can shut the doors from the public on a meeting or deny requests for records. Without facts and accountability, no real changes occur.

All newspaper publication should be in common local papers not business publications just to suffice a requirement.

Non-profit corporations need accountability requirements, audits and measurable results. They are businesses, with salaried executives and employees, like any publicly traded company, but no dividends are issued. Conflict of interest laws and procedures need to be established and maintained similar to that of a public official. When public funding is used, the transparency needs to follow. Without transparency, there is no credibility and usually few substantial results.

Policy around water issues can be obtained in the entitlement process. The State, through California Debt Limit Allocation bonds, provides conduit to fund housing in disadvantaged communities. The "affordable housing" definition is a statewide definition, if State funds are received, not a local agreement. The Federal Department of Housing and Urban Development through the Community Development Block Grant Funds (CDBF) does the same.

The State Public School System, through local school districts, can be a source of planning and participation. School districts are landowners, in trust for the People of the State of California.

Water policies can be established at that local level-both City and County, through the State governance structure and with the State Architect. No one has brought this group to the table. Many school districts, like Los Angeles, serve the disadvantaged communities already. Those parents, local to their feeder schools, are wealthy in knowledge of water related problems and an excellent source for conservation efforts. There are the Parent Collaborative, Advisory Councils and other groups created by Federally and State mandated education legislation and court cases.

Some cities may have a City Chartered agency, like Los Angeles, and its Neighborhood Council system. The Neighborhood Councils are public agencies. Others may have interested universities, like the University of Southern California and the Civic Engagement Initiative that can generate discussion and study participation.

One of the difficulties in working with just water related agencies is that the process is totally

insider. The public may know where the storm water

issues arise, but have no way of communicating that issue. Water scares the unknown public, but recreation and parks and fish and game and wildlife enthusiasts are water constituents. Park Advisory Boards, a local designation, is underutilized, appointed by local politicians and politically tied.

That group, if reformed into a local district election process, may result in closer contact to the disadvantaged community. Sources of problems, and therefore, potential solutions, can be identified.

The key here is in the identification of problems or the education of solutions.

It is that existing local contact, already existing in non-corporate site, that needs nurturing, not re-creation.

Integrated Regional Water Management Plans need a legislative designation to open them up to the public, its laws and therefore public participation.

All these comments can apply to upcoming policies in the California Water Plan.

Joyce Dillard P.O. Box 31377 Los Angeles, CA 90031

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